



July 19, 2018

USEPA Region VII
Superfund Division
Attn: Clint Sperry
11201 Renner Blvd.
Lenexa, KS 66219

Re: Request for Operating Changes at Huster Substation – OU4

Mr. Sperry:

Ameren Missouri is requesting the following changes to the operation of the Huster Substation (OU4) site:

1. **Extraction Wells 6 & 7:** The Monitoring Well (MW) 7 extraction well pump associated with the Groundwater Containment System (GCS) intermittently shuts down and when that occurs the GCS also shuts down. No detections of chemicals of concern (COCs) above MCL have been observed in either MW-6 or MW-7 for more than a year. In addition, no detections over Maximum Contaminant Levels (MCLs) have been observed at Piezometers (PZs) 6, 7 and 8 (located just north of the MW 6 and 7 capture zone) for at least three years. Accordingly, we believe that terminating use of these two extraction wells would not affect water quality off-property. Extraction well MW-5 would remain in service. Ameren requests that the well pumps at MW's 6 & 7 be taken out of service.
2. **Sampling Intervals:** Ameren also requests changing the sampling interval for all of the PZs (which are north of our property) from quarterly to semi-annual. All but PZ-2 have been below MCL detections for all COCs for a minimum of 1 year. PZ-2 experienced a one-time exceedance of the MCL for VC only slightly above the MCL in December 2017. We believe this interval change will not adversely affect our ability to track COC changes in this area. We will continue to be able to detect any groundwater changes outside of the substation property in a timely manner.
3. **One-Time Sampling Date Change:** As a result of recent (August, 2018) treatment injections at the Monitoring Wells inside of the substation, Ameren requests that the September, 2018 quarterly sampling be suspended until the next scheduled sampling event scheduled for December, 2018. We believe that the injection treatment will interfere with the September analytical results.

Please review these requests and feel free to contact me at 314-554-2194 if you have any questions or would like additional information.

Sincerely,

A handwritten signature in black ink that reads "Barbara J. Miller".

Barbara J. Miller
Consulting Environmental Scientist
Ameren Missouri

cc: Candice McGhee (MDNR)
S. C. Whitworth
C. J. Giesmann
S. B. Knowles